

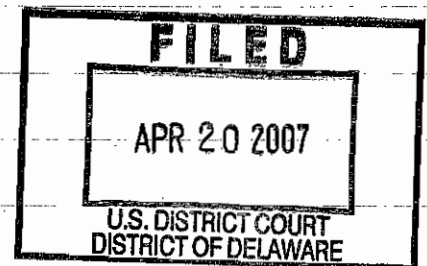
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V

CA. NO. 04-1350(GMS)

DR. SYLVIA FOSTER, ETAL



BD scanned

MOTION FOR INTERROGATORY
ANSWERS # 4 FOR DEFENDANT
DR. SYLVIA FOSTER IN ACCORDANCE
TO THE HONORABLE JUDGE GREGORY M. SLEET'S
APRIL 9TH 07 ORDER PURSUANT TO
FED R. CIV P# 33

DATE: 4/19/07

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) DR. S. FOSTER WHEN THE PLAINTIFF WAS STRAPPED DOWN WITH 4 POINT RESTRAINTS AND COULD NOT HARM HIMSELF OR OTHERS, WHY WAS IT NECESSARY TO INJECT HIM WITH EITHER OF THE PSYCHOTROPIC DRUGS ATIVAN - HALDOL OR GEODON
- 2.) DR. S FOSTER, WHY DID YOU PLACE THE PLAINTIFF ON SANCTION APON HIS ARRIVING AT THE DPC ON 5/21/04
- 3.) DR. S. FOSTER, WHY DID YOU CHOOSE STATUTORY DEFENSES UNDER 11 DEL C § 468, (3); (5) + (7), FOR WHICH STATE THAT YOU ARE PERMITTED BY SAID STATUTE TO ORDER THE USE OF FORCE, INSTEAD OF THE STATUTORY DEFENSE OF ACTUAL INNOCENCE.
- 4.) DR. S. FOSTER, WHY DIDNT YOU CHOOSE STATUTORY DEFENSES UNDER 11 DEL C § 468 (2) AND (4), FOR WHICH DEFINE MAINTENANCE OF REASONABLE DISCIPLINE - PREVENTION OF MISCONDUCT OR AUTHORITY AS A DOCTOR WHO IS ADMINISTERING TREATMENT.

- 5.) NAME THE D.P.C STAFF MEMBERS AT THE MITCHEL BUILDING DATING FROM 5/21/04 TO 6/25/04 THAT YOU DID NOT HAVE ADMINISTRATIVE AUTHORITY OVER.
- 6.) DR. S. FOSTER, WHAT IS THE CORRECT DATE OF THE PLAINTIFF'S TRIAL.
- 7.) DR. S. FOSTER, WHAT IS THE CORRECT DATE OF THE PLAINTIFF'S ARREST FOR THE OFFENSES YOU EVALUATED HIM FOR.
- 8.) DR. S. FOSTER, WHY ARE ONE OR TWO NURSE ATTENDANTS ASSIGNED TO MONITOR A PATIENT AT THE D.P.C
- 9.) DR. S. FOSTER, WAS ONE OR TWO NURSE ATTENDANT EVER ASSIGNED TO MONITOR THE PLAINTIFF JIMMIE LEWIS
- 10.) DR. S. FOSTER, THE PLAINTIFF WAS ~~INTERVIEWED~~ ORDERED TO BE STRAPPED DOWN WITH 4 POINT RESTRAINTS AT LEAST FOUR OF THE LAST 10 DAYS OF HIS STAY AT THE D.P.C, DOES THIS VALIDATE THAT ~~AND~~ THE PLAINTIFF WAS STABLE ENOUGH TO BE RETURNED TO THE D.O.C, AS STATED IN YOUR JUNE 10, 04 REPORT.

- 11.) DR. S. FOSTER WHICH D.P.C STAFF MEMBERS DID YOU INFORM THAT YOUR DIAGNOSIS OF THE PLAINTIFF JIMMIE LEWIS WAS, (AXIS I : MALINGERING), I-E, PRETENDING TO BE MENTALLY ILL.
- 12.) DR. S. FOSTER, IS SEROQUEL A PSYCHOTROPIC DRUG
- 13.) DR. S FOSTER, IS ATIVAN A PSYCHOTROPIC DRUG.
- 14.) DR. S FOSTER, IS GEODON A PSYCHOTROPIC DRUG
- 15.) DR. S. FOSTER, IS HALDOL A PSYCHOTROPIC DRUG.
- 16.) DR. S. FOSTER, AFTER YOU DIAGNOSED THE PLAINTIFF AS MALINGERING ON JUNE 10, 04, DID YOU HAVE THE AUTHORITY TO ORDER THAT THE PLAINTIFF NOT BE GIVEN ANY PSYCHOTROPIC DRUGS.

17.) DR. S. FOSTER, IS THE PLAINTIFF'S STATE OF MIND AT THE TIME OF HIS MAY 26, 03 ARREST, RELEVANT TO DETERMINE IF HE DID OR DID NOT ACKNOWLEDGE THE WRONGFULNESS OF HIS ACTIONS, IN REGARDS TO HIS COMPETENCY EVALUATION DATED JUNE 10, 04

18.) DR. S. FOSTER, IS THE PLAINTIFF'S STATE OF MIND AT THE TIME OF HIS OCT 21-23, 2003 TRIAL, RELEVANT TO DETERMINE IF HE DID OR DID NOT UNDERSTAND THE COURT PROCEDURES AS IS ESTABLISHED BY THE MCGARRY CRITERIA, IN REGARDS TO HIS COMPETENCY EVALUATION DATED JUNE 10, 04

19.) DR. S. FOSTER, WHO ORDERED THE PLAINTIFF TO BE (4) POINT RESTRIAINED WITHOUT YOUR VERBAL OR WRITTEN CONSENT DURING 5/21/04 TO 6/25/04, THE COURSE OF THE PLAINTIFF'S STAY AT THE D.P.C.

20.) DR. S. FOSTER, DOES THE PSYCHOTROPIC DRUG GEODON THE PLAINTIFF WAS GIVEN FOR AGITATION ACTUALLY CAUSE AGITATION.

21.) DR. S. FOSTER ARE YOU WILLING
TO EXPEDITE THIS CIVIL ACTION
BY ENTERING INTO NEGOTIATION
FOR SETTLEMENT

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 19TH DAY OF APRIL,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR INTERROGATORY ANSWERS
4 FOR DEFENDANT DR. SYLVIA FOSTER BY U.S. POSTAL
TO EACH OF THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

LOUIS J. RIZZO JR, ESQ
1001 JEFFERSON PLAZA
SUITE 202
WILMINGTON, DELAWARE 19801
ATTORNEY FOR DR. S. FOSTER

DATE: 4/19/07

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IM Louis D. Dickerson
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19 APR 2007 PM 3 T



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844 N. Kings St, Loc 180X 18
WILMINGTON, Delaware
- 19801

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